



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

May 18, 2021

BY ECF

Hon. Denise L. Cote
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Victor Ahaiwe and Herman Bass*, 20 Cr. 179 (DLC)

Dear Judge Cote:

Motion *in limine* oppositions in the above-captioned case are due on May 24, 2021 (dkt. 247), and a change of plea conference for trial defendant Herman Bass has been scheduled for May 26. Given the scheduled plea, the Government and Herman Bass write jointly to request that the deadlines for motion *in limine* oppositions be extended until May 28 in order to avoid the need to unnecessarily draft and file those oppositions.

The request is limited to the Government's response to Bass's motions (dkt. 258) and to Bass's response to the Government's motions (dkt. 260)—the Government contemplates that it will file a response to trial defendant Victor Ahaiwe's motions (dkt. 259) by May 24 as planned, and that Ahaiwe will similarly file his response to the Government's motions (dkt. 260) by May 24 as planned.

Respectfully Submitted,

AUDREY STRAUSS
United States Attorney

Granted.
Denise Cote
5/18/21

by: /s/ Kevin Mead
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